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8 Attorneys for Defendant

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 SHAHID KHAN

14 Plaintiff,

15 v.

16 JONATHAN SCHARFEN,
17 Acting Director, United States Citizenship
and Immigration Services,

18 Defendant.
19

No. 08-cv-1398 (SC)

**STIPULATION TO EXTEND DATES
AND [PROPOSED] ORDER**

Date: July 25, 2008
Time: 10:00 a.m.
Courtroom: 1, 17th Floor

**[NO APPEARANCE, NO ORAL
ARGUMENT]**

20 Plaintiff, by and through his attorney of record, and Defendant, by and through his
21 attorney of record, hereby stipulate, subject to the approval of the Court, to the following:

22 1. Plaintiff filed this action on or about March 12, 2008, and Defendant was served on or
23 about this date.

24 2. Pursuant to this Court's Order Setting Initial Case Management Conference and ADR
25 Deadlines, dated March 12, 2008, the parties were required to file a joint case management
26 statement on June 9, 2008, and were required to attend a case management conference on June
27 16, 2008.
28

1 3. On May 9, 2008, Defendant filed a motion to dismiss and noticed a hearing for July
2 25, 2008.

3 4. On May 16, 2008, Plaintiff filed his opposition to Defendant's motion to dismiss and
4 cross-motoned for leave to file an amended complaint.

5 5. On June 3, 2008, Defendant filed his reply supporting his motion to dismiss and
6 opposing Plaintiff's motion for leave to file an amended complaint.

7 6. On June 10, 2008, Plaintiff filed a reply to Defendant's reply and opposition to
8 Plaintiff's motion for leave to file an amended complaint.

9 7. On June 25, 2008, Judge Conti issued a Related Case Order reassigning this case to
10 Judge Conti on the basis that it is related to another case before him, C 07-02283 SC.

11 8. On July 8, 2008, Defendant renoticed the Motion to Dismiss.

12 9. The parties agree that good cause exists for granting an extension of the dates on
13 which the case management statement and case management conferences are currently scheduled
14 since the case has been reassigned to Judge Conti and his determination on Defendant's motion
15 to dismiss will either moot out the issue in its entirety or significantly change the nature of the
16 arguments to be considered by the Court.

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1 10. The parties hereby respectfully ask this Court to extend the case management dates as
2 follows:

3 Last day to file/serve Joint Case Management Statement: August 29, 2008

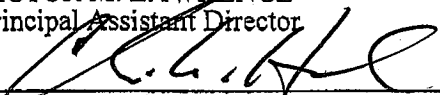
4 Case Management Conference: September 5, 2008, 10:00 a.m.

5 Dated: July 8, 2008

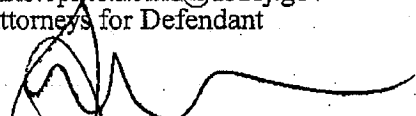
Respectfully submitted,

6 GREGORY G. KATSAS
7 Assistant Attorney General
8 DAVID J. KLINE
9 Director, District Court Section
10 VICTOR M. LAWRENCE
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By:


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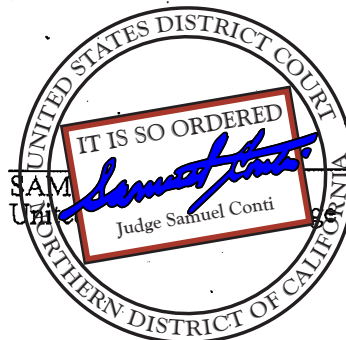
15 Dated: July 8, 2008


JONATHAN M. KAUFMAN
Attorney for Plaintiff

20 ORDER

21 Pursuant to stipulation, IT IS SO ORDERED.

22
23
24 Dated this 9 day of July, 2008



25
26
27
28 STIPULATION TO EXTEND DATES;
AND [PROPOSED] ORDER, 08-1398 (SC)